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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DEBORAH REYNOLDS., an individual,

Plaintiff,

vs.

THREE DESERTS OF NEVADA, LLC, a
Nevada limited liability company; and DOES I
through V; and ROE CORPORATIONS I
through V,

Defendants.

Case No. 2:22-cv-01034-GMN-VCF

STIPULATION AND ORDER TO EXTEND
SCHEDULING ORDER DEADLINES [ECF NO. 14]
(First Request to Extend Scheduling Order Deadlines)

Pursuant to Local Rules IA 6-1, IA 6-2, 7-1, 26-1, and 26-3, plaintiff Deborah Reynolds and defendant Three Deserts of Nevada, LLC hereby stipulate and agree to an approximately 60-day extension of the deadlines set forth in the Scheduling Order (ECF No. 14). This is the first stipulation extend such deadlines. The extension is necessary to accommodate the parties' on-going settlement discussions and, if settlement is not possible, the scheduling conflicts presented by the year-end holidays.

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A. Discovery Completed to Date

The parties held the Rule 26(f) conference on July 11, 2022, and submitted the stipulated discovery plan and proposed scheduling order on July 29, 2022. (ECF No. 12.) This Court approved the discovery plan on August 2, 2022. (ECF No. 14.) Since then, the parties engaged in the following discovery:

1. Plaintiff's service of her Fed. R. Civ. P. 26(a)(1) disclosure;
2. Defendant's service of its Fed. R. Civ. P. 26(a)(1) disclosure;
3. Plaintiff's service of her first set of interrogatories to Defendant;
4. Plaintiff's service of her first set of requests for production to Defendant;
5. Defendant's service of its responses to plaintiff's first set of interrogatories; and
6. Defendant's service of its responses to plaintiff's first set of requests for production.

B. DISCOVERY THAT REMAINS TO BE COMPLETED

The parties expect that they may need to conduct some or all of the following discovery if they are unable to reach a mutually agreeable settlement:

1. defendant's written discovery requests to plaintiff;
2. possible follow-up written discovery;
3. inspection of the accident scene;
4. the parties' service of expert disclosures;
5. documents subpoena to third-parties; and
6. deposition of parties, third-parties, and experts.

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**C. REASONS WHY THE REMAINING DISCOVERY WAS NOT COMPLETED
WITHIN THE TIME LIMITS**

The extension is necessary to accommodate the parties' on-going settlement discussions and, if settlement is not possible, the year-end holidays. The parties are currently exploring settlement and attempting to minimize litigation costs during that process. If settlement does not occur, the parties will need additional time to complete discovery. The parties also expect the year-end holidays to disrupt settlement negotiations and discovery efforts. The current deadlines do not allow the parties to adequately address these issues. Therefore, the requested extension of the deadlines is warranted.

D. PROPOSED DISCOVERY SCHEDULE

Pursuant to LR 26-4, the parties propose to extend the following deadlines by about 60 days:

	Original Deadline	Proposed Extended Deadline
Discovery Cut-Off Date	March 13, 2023	May 15, 2023
Amending Pleadings or Adding Parties	December 13, 2022	unchanged
Rule 26(a)(2) Initial Disclosures	January 13, 2023	March 16, 2023
Rule 26(a)(2) Rebuttal Disclosures	February 13, 2023, or 30 days after the initial disclosure of experts	April 14, 2023, or 30 days after the initial disclosure of experts
Dispositive Motions	April 12, 2023	June 14, 2023
Pre-Trial Order	May 12, 2023	July 14, 2023, or 30 days after the decision on any dispositive motions (whichever is later)

1 Dated: December 20, 2022

Dated: December 20, 2022

2 ALDRICH LAW FIRM, LTD.

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3
4 /s/Catherine Hernandez

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Three Deserts of Nevada, LLC

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10 IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

12-20-2022

DATED: _____